

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 03-MDL-1570

**IN RE: TERRORIST ATTACKS ON
SEPTEMBER 11, 2001.**

**NOTICE OF MOTION FOR THE
ADMISSION OF TIMOTHY B. MILLS
AS CO-LEAD COUNSEL PRO HAC
VICE**

This document relates to:

New York Marine and General Insurance Co. v. Al Qaida, et al., Civil Action No. 1:04-CV-06105-RCC

Federal Insurance, et al. v. Al Qaida, et al., Civil Action No. 1:03-CV-06978-RCC

O'Neill v. The Republic of Iraq, Civil Action No. 04-CV-01076-RCC

PLEASE TAKE NOTICE that upon the annexed Certification of Timothy B. Mills in support of this motion, and the Certificate of Good Standing annexed thereto, as well as the supporting Certification of Marc D. Powers, Defendant Republic of Iraq will move this Court before the Honorable Richard C. Casey at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, NY 10007, pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern District of New York, for an order allowing the admission of Timothy B. Mills, member of the firm of Maggs & McDermott, LLC and member in good standing of the California and District of Columbia Bars, as attorney pro hac vice to argue or try this case in whole or in part as co-lead counsel to Defendant Republic of Iraq.


In further support of this motion, Defendant Republic of Iraq states that there are no pending disciplinary proceedings against Mr. Mills in any State or Federal court.

Further, we have consulted with plaintiffs' and defendants' executive representatives, plaintiffs' representative takes no position on this motion.

WHEREFORE, Defendant Republic of Iraq respectfully requests that the Court enter the attached order granting the motion for the pro hac vice admission of Timothy B. Mills.

Dated: New York, New York
April 3, 2006

Respectfully submitted,
BAKER & HOSTETLER LLP

By: 
Marc D. Powers (MDP-1528)
666 Fifth Avenue, 16th Floor
New York, NY 10103
(212) 589-4216
(212) 589-4201 (Facsimile)
mpowers@bakerlaw.com

**Attorneys for Defendant
Republic of Iraq**

 **ORIGINAL**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

**IN RE: TERRORIST ATTACKS
ON SEPTEMBER 11, 2001.**

CASE NO. 03-MDL-1570

**AFFIDAVIT OF TIMOTHY B. MILLS IN
SUPPORT OF MOTION FOR THE
ADMISSION OF TIMOTHY B. MILLS AS CO-
LEAD COUNSEL PRO HAC VICE**

This document relates to:

New York Marine and General Insurance Co. v. Al Qaida, et al., Civil Action No. 1:04-CV-06105-RCC

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O'Neill v. The Republic of Iraq, Civil Action No. 04-CV-01076-RCC

STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)

Timothy B. Mills, being duly sworn, hereby deposes and says as follows:

1. Pursuant to Local Civil Rule 1.3(c) of the Rules of the United States District Courts for the Southern and Eastern Districts of New York, I seek admission *pro hac vice* to represent Defendant Republic of Iraq in this action.

2. I am and have been a member in good standing of the bar of the State of California since 1986 and the Bar of the District of Columbia since 1995. Attached hereto as Exhibit A is an original Certificate of Good Standing from the District of Columbia Court of Appeals, dated March 8, 2006. A list of the appellate court and federal court bars to which I am admitted is attached as Exhibit B.

3. I am currently a partner with the firm Maggs & McDermott, LLC, 910 17th Street, N.W. Washington, DC 20006, telephone number (202) 457-8090. I regularly represent litigants in federal and state courts.

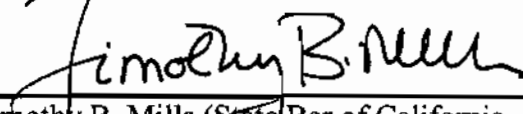
4. Since July 2004, The Ministry of Justice of the Republic of Iraq has retained me to defend, and I have defended, against claims asserted against the Republic of Iraq in the federal courts of the United States, including those of the District of Columbia and the Southern District of New York.

5. I hereby certify that I have studied the Local Civil Rules for the Southern District of New York.

6. If admitted to practice *pro hac vice* in this matter, I will conduct myself in the manner required of attorneys so admitted.

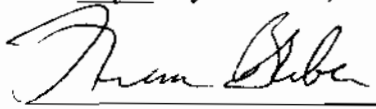
7. Accordingly, I respectfully request permission to be admitted *pro hac vice* to practice and participate in the above-captioned cases as counsel for Defendant Republic of Iraq.

Respectfully submitted,

 21 Mar 2006

Timothy B. Mills (State Bar of California
#126085, D.C. Bar #425209)
MAGGS & MCDERMOTT, LLC
910 17th Street, N.W.
Washington, DC 20006
(202) 457-8090

Sworn to and subscribed before me
this 21st day of March, 2006.



Notary Public

Theresa Elaber
Notary Public, State of New York
No. 01BL612228
Qualified in Queens County
Commission Expires 2007



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia
Court of Appeals, do hereby certify that

TIMOTHY B. MILLS

was on the 7TH day of JULY, 1995

duly qualified and admitted as an attorney and counselor and
entitled to practice before this Court and is, on the date
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have
hereunto subscribed my name
and affixed the seal of this
Court at the City of
Washington, D.C., on March
8, 2006.

GARLAND PINKSTON, JR., CLERK

By:

A handwritten signature in cursive script, appearing to read "C. Jackson", written over a horizontal line.

Deputy Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

**IN RE: TERRORIST ATTACKS
ON SEPTEMBER 11, 2001.**

CASE NO. 03-MDL-1570

**EXHIBIT B TO AFFIDAVIT OF TIMOTHY B.
MILLS IN SUPPORT OF MOTION FOR THE
ADMISSION OF TIMOTHY B. MILLS AS CO-
LEAD COUNSEL PRO HAC VICE**

This document relates to:

New York Marine and General Insurance Co. v. Al Qaida, et al., Civil Action No. 1:04-CV-06105-RCC

Federal Insurance, et al. v. Al Qaida, et al., Civil Action No. 1:03-CV-06978-RCC

O'Neill v. The Republic of Iraq, Civil Action No. 04-CV-01076-RCC

EXHIBIT B

<u>Court</u>	<u>Date Admitted</u>
Supreme Court of California	December 1986
Court of Appeals for the District of Columbia	July 1995
United States Court of Appeals for the Armed Forces	June 1992
United States Court of Appeals for the Federal Circuit	August 1995
United States Court of Appeals for the Fourth Circuit	April 1998
United States District Court for the Southern District of California	December 1986
United States Court of Federal Claims	November 1989
United States District Court for the District of Columbia	June 1998
United States District Court for the District of Colorado	September 1999
Army Court of Military Review	June 1992

 **ORIGINAL**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

**IN RE: TERRORIST ATTACKS
ON SEPTEMBER 11, 2001.**

ECF CASE

CASE NO. 03-MDL-1570

**CERTIFICATION OF MARC D. POWERS IN
SUPPORT OF THE MOTION OF REPUBLIC
OF IRAQ FOR THE ADMISSION OF
TIMOTHY B. MILLS AS CO-LEAD COUNSEL
PRO HAC VICE**

This document relates to:

New York Marine and General Insurance Co. v. Al Qaida, et al., Civil Action No. 1:04-CV-06105-RCC

Federal Insurance, et al. v. Al Qaida, et al., Civil Action No. 1:03-CV-06978-RCC

O'Neill v. The Republic of Iraq, Civil Action No. 04-CV-01076-RCC

MARC D. POWERS, states, under penalty of perjury and pursuant to 28 U.S.C.

§ 1746:

1. I am a member in good standing of the bar of this Court, having been admitted to practice before the Southern District of New York in May 1981.
2. This certification is made in support of a motion seeking the admission pro hac vice in this action, pursuant to Local Civil Rule 1.3 (c) of the United States Court for the Southern District of New York, of Timothy B. Mills.
3. Mr. Mills, who has his office at 910 17th Street, N.W., Washington, DC 20006, is counsel for Defendant Republic of Iraq. He is a member in good standing of the Bars of the

District of Columbia and the State of California. *See* Certificate of Good Standing attached to the Affidavit of Timothy B. Mills in support of this motion, submitted herewith.

4. I believe that Mr. Mills will conduct himself in a manner required of attorneys admitted to practice in this Court pro hac vice. I therefore respectfully request that he be allowed to appear pro hac vice in this matter for the purpose of counseling and advocating for Defendant Republic of Iraq in this litigation.

Dated: New York, New York
April 3, 2006

I certify that the foregoing is true and correct.

A handwritten signature in black ink, appearing to read 'M. Powers', is written over a horizontal line.

Marc D. Powers (MDP-1528)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

**IN RE: TERRORIST ATTACKS
ON SEPTEMBER 11, 2001.**

ECF CASE

CASE NO. 03-MDL-1570

**ORDER ADMITTING COUNSEL TO
PRACTICE PRO HAC VICE**

This document relates to:

New York Marine and General Insurance Co. v. Al Qaida, et al., Civil Action No. 1:04-CV-06105-RCC

Federal Insurance, et al. v. Al Qaida, et al., Civil Action No. 1:03-CV-06978-RCC


O'Neill v. The Republic of Iraq, Civil Action No. 04-CV-01076-RCC

This matter comes before the Court on Defendant Republic of Iraq's motion to admit counsel pro hac vice.

Upon the matters presented to the Court, it is hereby ORDERED that the motion be, and hereby is, GRANTED.

The admitted attorney, Timothy B. Mills, is permitted to argue or try this particular case in whole or in part as co-lead counsel or advocate for Defendant Republic of Iraq.

Entered this 7 day of April, 2006.



United States District Judge

A copy of this order shall be sent to the following:

Marc D. Powers
Baker & Hostetler LLP
666 Fifth Avenue, 16th Floor
New York, N.Y. 10103
Email: mpowers@bakerlaw.com
-and-

Timothy B. Mills
MAGGS & MCDERMOTT LLC
910 17th Street, N.W.
Washington, DC 20006
Email: timothybmills@aol.com
Co-lead Counsel for Defendant Republic of Iraq

All plaintiffs' and defendants' counsel via ECF

03-md-1570

(RCC)

CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of April 2006, a copy of the foregoing Motion for Admission *Pro Hac Vice* of Timothy B. Mills, the Affidavit and Certificate of Good Standing attached thereto, and the Proposed Order for Admission *Pro Hac Vice* were served via Electronic Mail.



Brian K. Esser, Esq.
Baker & Hostetler LLP

2006-04-11 3:25
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